

# **EXHIBIT 31**

12/22/2017

Waymo LLC v Uber Technologies, Inc. and Ottomotto LLC  
Case No. 3:17-cv-00939-WHA**1. Personnel Who Have Used Wickr or Similar Platform<sup>1</sup>**

First name	Last Name	Type of Ephemeral Messaging Service
Rahul	Abrol	Wickr SCIF/PRO; Wickr ME
Eric	Alexander	Telegram
Jace	Alfiere	Wickr SCIF/PRO; Wickr ME
Laura	Alioto	Wickr SCIF/PRO
Jason	Allen	Wickr SCIF/PRO
Rey	Allie	Wickr SCIF/PRO; Wickr ME
Julie	Ambrose	Wickr SCIF/PRO
Nate	Anderson	Wickr SCIF/PRO
William	Anderson	Wickr SCIF/PRO
Nick	Ash	Wickr
Pooja	Ashok	Wickr SCIF/PRO
Scott	Atkinson	Wickr SCIF/PRO
Chiraag	Aval	Wickr SCIF/PRO
Amos	Barreto	Wickr SCIF/PRO; Wickr ME
Nicole	Bartow	Wickr SCIF/PRO; Wickr ME
DC	Berdy	Wickr
Aaron	Bergstrom	Wickr SCIF/PRO; Telegram
Travis	Bogard	Telegram
Daniel	Borges	Wickr SCIF/PRO
Shawn	Bracken	Wickr SCIF/PRO
Dalene	Bramer	Wickr SCIF/PRO
Kurt	Brasch	Wickr SCIF/PRO
Tracey	Breeden	Wickr SCIF/PRO
Kevin	Brinig	Telegram
Jessica	Brooks	Wickr SCIF/PRO
Mike	Brown	Telegram
Matthew	Bryant	Wickr SCIF/PRO; Wickr ME
Andres	Bucchi	Wickr SCIF/PRO
Jordan	Buettner	Wickr SCIF/PRO
Charles	Burns	Wickr SCIF/PRO
Avery	Bustamonte	Wickr SCIF/PRO
Benjamin	Butin	Google Hangouts (set to "incognito," "off the
Jonathan	Byrne	Wickr SCIF/PRO
David	Campbell	Wickr SCIF/PRO
<p>1. Inclusion on this list does not necessarily mean that the person used the ephemeral messaging platform listed, but it means that the person was at some point at least signed up for or invited to that platform.</p> <p>2. Legal personnel listed herein as having used Wickr had a Wickr account, but may not have used it.</p>		

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Stella	Chamarelli	Wickr SCIF/PRO
Brett	Champlin	Wickr SCIF/PRO
Brett	Champlin	Wickr SCIF/PRO
Karthik	Chandrashekar	Wickr SCIF/PRO
Frank	Chang	Wickr SCIF/PRO
Sheng-Dean	Chang	Wickr SCIF/PRO
Yulin	Chen	Wickr SCIF/PRO; Wickr ME; Telegram
Michelle	Chen	Telegram
Ben	Chiang	Wickr SCIF/PRO; Wickr ME; Telegram
Susan	Chiang	Wickr SCIF/PRO; Wickr ME
Aaron	Chou	Wickr SCIF/PRO
Peter	Chovanec	Wickr SCIF/PRO
Anna	Chung	Wickr SCIF/PRO; Wickr ME, Telegram
Craig	Clark	Wickr SCIF/PRO; Wickr ME
Ben	Cooper	Wickr SCIF/PRO;
Sean	Coyne	Wickr SCIF/PRO
Juan_Pablo	Crespo	Wickr SCIF/PRO
Robert	Crowley	Wickr SCIF/PRO; Wickr ME
Brian	Cullinane	Wickr SCIF/PRO
Roxana	del_Toro_Lopez	Wickr SCIF/PRO
Shawnee	Delaney	Wickr SCIF/PRO; Wickr ME; Whatsapp
Will	Demaine	Wickr SCIF/PRO; Wickr ME
Nirvan	Dey	Wickr SCIF/PRO
Yifan	Ding	Wickr SCIF/PRO; Wickr ME
Qiansha	Ding	Telegram; WeChat
Qi	Dong	Wickr SCIF/PRO; Wickr ME
Aaron	Doubt	Telegram
Thibault	Doutre	Wickr SCIF/PRO
Deon	DuToit	Wickr SCIF/PRO; Whatsapp
David	Dy Tang	Telegram
Melanie	Ensign	Wickr SCIF/PRO
Brooks	Entwistle	Telegram
Mason	Feldman	Wickr SCIF/PRO; Snapchat
Faranak	Firozan	Wickr SCIF/PRO
Alberto	Fittarelli	Wickr SCIF/PRO; Wickr ME
John	Flynn	Wickr SCIF/PRO
David	Fong	Wickr SCIF/PRO

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First name	Last Name	Type of Ephemeral Messaging Service
Leon	Foong	Telegram
Marissa	Foust	Telegram
Christian	Freese	Whatsapp; Telegram
Rob	Fuller	Wickr SCIF/PRO
Raymond	Galaviz	Wickr SCIF/PRO
Galeno	Garbe	Wickr SCIF/PRO
Alex	Garbutt	Wickr SCIF/PRO
Prashant	Garg	Wickr SCIF/PRO; Wickr ME
Chris	Gates	Wickr SCIF/PRO
Xin	Ge	Wickr SCIF/PRO; Telegram
Austin	Geidt	Telegram
Projjal	Ghatak	Wickr SCIF/PRO; Wickr ME
Parham	Ghods	Wickr SCIF/PRO
Nicholas	Gicino	Wickr SCIF/PRO; Wickr ME
Andrew	Glickman	Telegram
Andy	Goldin	Wickr SCIF/PRO
George	Gordon	Wickr SCIF/PRO
Margot	Grabie	Snapchat
Ryan	Graves	Telegram
Carla	Gray	Wickr SCIF/PRO; Whatsapp
Collin	Greene	Wickr SCIF/PRO
Alan	Grubbe	Wickr SCIF/PRO
Ashley	Guest	Wickr SCIF/PRO
Neeraja	Gunaratnam	Wickr SCIF/PRO
Jasmine	Guo	Wickr SCIF/PRO; Wickr PRO; Wickr ME; Telegram
Mike	Haas	Wickr SCIF/PRO
Randall	Haimovici	Wickr SCIF/PRO; Wickr ME
Andrew	Hasbun	Wickr SCIF/PRO
Laurent	Hautefeuille	Wickr SCIF/PRO
Spencer	Hawes	Wickr SCIF/PRO
James	Hawkins	Telegram
Susan	Hendrick	Wickr SCIF/PRO
Mat	Henley	Wickr SCIF/PRO; Wickr ME; Telegram, Google Hangouts (set to "incognito," "off the record" or auto-delete); Facebook Messenger
Art	Henry	Wickr SCIF/PRO; Wickr ME; Telegram
Fires	Here	Wickr SCIF/PRO

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Mary	Hillas	Wickr SCIF/PRO
Don	Hoang	Telegram
Liane	Hornsey	Hangouts
Zehao	Hu	Wickr SCIF/PRO
Robert	Hugh	Wickr SCIF/PRO
David	Hughes	Wickr SCIF/PRO; Wickr PRO; Wickr ME; Telegram
Naushin	Husain	Wickr SCIF/PRO
Linda	Isley	Wickr SCIF/PRO
Amr	Ismail	Wickr SCIF/PRO
Natalie	Iturralde	Wickr SCIF/PRO
Ric	Jacobs	Wickr SCIF/PRO; Wickr ME
Vardhaman	Jain	Whatsapp; Telegram
Mohamad	Jardaneh	Wickr SCIF/PRO
Angela	Johnson	Wickr SCIF/PRO
Jeff	Jones	Wickr SCIF/PRO; Wickr ME
Mark	Jones	Wickr SCIF/PRO
Travis	Kalanick	Telegram; Snapchat
Matt	Kaminski	Wickr SCIF/PRO
Jodi	Kawada_Page	Wickr SCIF/PRO
Matthew	Kell	Wickr SCIF/PRO
Billy	Kewell	Wickr SCIF/PRO
_xxxx	KMaher	Wickr SCIF/PRO
Abi	Komma	Wickr SCIF/PRO
Rowena	Kong	Telegram
Sameer	Kshirsager	Telegram
Ashish	Kurmi	Wickr SCIF/PRO
Robert	Kyle	Wickr SCIF/PRO
Steven	Lacy	Wickr SCIF/PRO
Elisca	Lagerweij	Wickr SCIF/PRO
Mingjie	Lai	Wickr SCIF/PRO
Nimish	Lalwani	Whatsapp; Telegram
Horace	Lam	Wickr SCIF/PRO; Wickr PRO; Wickr ME; Telegram
Kieu	Lam	Wickr SCIF/PRO
Pablo	Lamuraglia	Wickr SCIF/PRO

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Christina	Ledoux	Wickr SCIF/PRO
Jonny	Lee	Wickr SCIF/PRO; Wickr ME; Telegram
Silvanus	Lee	Wickr SCIF/PRO; Wickr ME
Nick	Letwin	Telegram
Anthony	Levandowski	Wickr SCIF/PRO; Telegram
Alex	Levinson	Wickr SCIF/PRO; Wickr ME, Telegram
Kyle	Lewis	Wickr SCIF/PRO
Lu	Li	Wickr SCIF/PRO
Abe	Liao	Wickr SCIF/PRO
Jonathan	Lieberman	Wickr
Yibo	Ling	Telegram
Yibo	Ling	Telegram
Eric	Lipman	Wickr SCIF/PRO; Telegram
Yuwei	Liu	Wickr SCIF/PRO
Zhen	Liu	Telegram
Tipper	Llaguno	Wickr SCIF/PRO
Jeremiah	Lu	Telegram
Jeff	Lui	Telegram
Fanny	Ma	Telegram; WeChat
Andrew	Macdonald	Wickr SCIF/PRO
Kevin	Maher	Wickr SCIF/PRO; Wickr ME; Telegram
Charles	Man	Telegram
Becky	Mar	Wickr SCIF/PRO
Javier	Marcos	Wickr SCIF/PRO
Mohale	Matloga	Wickr SCIF/PRO
Andrew	Matthews	Wickr
Liz	Mattin	Wickr SCIF/PRO
Mia	Mazza	Wickr SCIF/PRO
Chris	McCann	Wickr SCIF/PRO
Brittney	McClary	Wickr SCIF/PRO; Wickr ME
Greg	McCurdy	Wickr SCIF/PRO
Peter	McKee	Wickr SCIF/PRO

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Michael	McLoughlin	Wickr SCIF/PRO; Wickr ME; Telegram; Signal; Facebook Messenger (using "Secret Conversation" feature with disappearing messages)
Eric	Meyhofer	Telegram
Matthew	Miao	Telegram
Emil	Michael	Telegram
Matthew	Moore	Telegram
Rhian	Morgan	Snapchat
Zac	Morris	Wickr SCIF/PRO
John	Mulgrew	Wickr SCIF/PRO
Jesse	Murray	Wickr SCIF/PRO
Gourav	Nagar	Wickr SCIF/PRO
David	Newberry	Wickr
Katie	Newman	Wickr SCIF/PRO
Eric	Newman	Wickr SCIF/PRO
Craig	Nicol	Telegram
Ken	Njuguna	Wickr SCIF/PRO
Jacob Donnelly	Nocon	Wickr SCIF/PRO; Wickr ME
Jake	Nocon	Wickr SCIF/PRO; Wickr ME
Alex	Nussbacher	Wickr SCIF/PRO; Telegram
Lisa	O'Connor	Wickr SCIF/PRO
Derrick	Ongchin	Telegram
Angela	Padilla	Wickr SCIF/PRO; WickrME; Telegram
Nick	Pailthorpe	Wickr SCIF/PRO
Ambar	Pansari	Wickr SCIF/PRO
Alberto	Parada	Wickr SCIF/PRO
Amar	Patel	Wickr SCIF/PRO
Lisen	Peng	Wickr SCIF/PRO
Allen	Penn	Wickr
Reynaldo	Perez	Wickr SCIF/PRO
Quang	Pham	Wickr SCIF/PRO
Quang2	Pham	Wickr SCIF/PRO
Jeff	Pike	Wickr SCIF/PRO
Kristy	Pilipauskas	Wickr SCIF/PRO
Andi	Pimentel	Telegram
Francisco	Pinilla	Wickr SCIF/PRO
Cameron	Poetzsch	Telegram
Susan	Popal	Whatsapp; Telegram
Frank	Portman	Wickr SCIF/PRO; Wickr ME

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Tylee	Potter	Telegram
Allison	Pozzi	Wickr SCIF/PRO
Gopal	Purohit	Wickr SCIF/PRO
Nina	Qi	Telegram
Yong	Qiao	Wickr SCIF/PRO
Miraj	Rahematpura	Snapchat
Prithvi	Rai	Wickr SCIF/PRO
Vinay	Ramani	Telegram; WeChat
Varun	Rau	Wickr SCIF/PRO
David	Richter	Wickr SCIF/PRO; Telegram
Fraser	Robinson	Telegram
Sergio	Romero	Wickr SCIF/PRO
Lior	Ron	Wickr SCIF/PRO; Wickr ME; Telegram
Anthony	Rose	Wickr SCIF/PRO
Heather	Rothenberg	Wickr SCIF/PRO
Ariel	Ruiz	Wickr SCIF/PRO
Edward	Russo	Wickr SCIF/PRO; Wickr ME
Siddharth	Saoji	Wickr SCIF/PRO
Aiden	Scandella	Wickr SCIF/PRO
Sachin	Sharma	Wickr SCIF/PRO; Wickr Me
Weiwei	Shen	Wickr SCIF/PRO
Bernard	Sheridan	Wickr SCIF/PRO
Lin	Shi	Wickr
Yi-Bing	Shi	Telegram
Andrew	Shieh	Wickr SCIF/PRO
Chris	Shin	Wickr SCIF/PRO
Spiro	Sideris	Wickr SCIF/PRO; Wickr ME
Matt	Smith	Wickr SCIF/PRO
Rachael	Smith	Wickr SCIF/PRO;
Maus	Stearns	Wickr SCIF/PRO
Neil	Stegall	Telegram
Jimmy	Stelter	Wickr SCIF/PRO; Wickr ME
Chris	Storm	Wickr SCIF/PRO
Wade	Stormer	Wickr SCIF/PRO
Justin	Suhr	Wickr SCIF/PRO
Joe	Sullivan	Wickr SCIF/PRO; Wickr ME; Hangouts; Threema
Mike	Sullivan	Wickr SCIF/PRO
Richard	Sumnall	Wickr SCIF/PRO
Jin	Sun	Telegram
Achia	Swift	Wickr SCIF/PRO
Daniyal	Syed	Wickr SCIF/PRO
Matyas	Tamas	Wickr SCIF/PRO; Wickr ME



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First name	Last Name	Type of Ephemeral Messaging Service
Kirsten	Thompson	Telegram
Hudson	Thrift	Wickr SCIF/PRO
Bart	Tissue	Wickr SCIF/PRO
Jai	Toor	Wickr SCIF/PRO
Karen	Toro	Wickr SCIF/PRO
Mandy	Tory	Wickr SCIF/PRO
Tyler	Trerotola	Wickr SCIF/PRO
David	Vidal	Wickr SCIF/PRO
Gabriel	Villasenor	Wickr SCIF/PRO
Jose_Antonio	Villela	Wickr SCIF/PRO
Julie	Viray	Telegram
Ashley	Vivlamore	Wickr SCIF/PRO; Wickr ME
Kagure	Wamunyu	Telegram
David	Wang	Wickr SCIF/PRO
Hui	Wang	Wickr SCIF/PRO; Wickr ME
Runze	Wang	Wickr SCIF/PRO
Randy	Wanis	Wickr SCIF/PRO
Caitlin	Washburn	Wickr SCIF/PRO
Maxwell	Watkins	Wickr SCIF/PRO
Michael Cory	Weiss-Malik	GChat (set to "incognito," "off the record" or auto-delete), Google Hangouts (set to "incognito," "off the record" or auto-delete)
Kayla	Whaling	Wickr SCIF/PRO
Hugh	White	Wickr SCIF/PRO
Christian	Wicks	Wickr SCIF/PRO
Anne	Widera	Wickr SCIF/PRO
Matthew	Wilson	Telegram
Brook	Woldemariam	Wickr SCIF/PRO; Wickr ME; Telegram
Kate	Wolf	Wickr SCIF/PRO
Barry	Wong	Wickr SCIF/PRO
Ross	Worden	Wickr SCIF/PRO; Wickr ME; Telegram; Facebook Messenger
Zhen	Wu	Wickr SCIF/PRO
Matt	Wyndowe	Telegram
Stephen	Yang	Wickr SCIF/PRO
Nan	Yang	Telegram
Dongyi	Ye	Wickr SCIF/PRO
Salle	Yoo	Whatsapp; Telegram
John	Yu	Telegram
Catherine	Yumul	Wickr SCIF/PRO
Brian	Zajac	Telegram
Matthew	Zehnder	Snapchat

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First name	Last Name	Type of Ephemeral Messaging Service
Baoguang	Zhai	Wickr SCIF/PRO; Wickr ME
Jinjian	Zhai	Wickr SCIF/PRO; Wickr ME
Yingying	Zheng	Wickr SCIF/PRO
Rose	Zhong	Telegram
Noah	Zych	Telegram
Market Place Analytics (in general)		Wickr SCIF/PRO; Wickr ME
Threat Ops (in general)		Wickr SCIF/PRO; Wickr ME
Benjamin Butin's Group (in general)		Google Hangouts (set to "incognito," "off the record" or auto-delete)
China and SEA Ops Team (in general)		Wickr SCIF/PRO; Telegram
Business Development Group (in general)		Telegram